

December 9, 2022

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The Honorable Analisa Torres
 United States District Court
 Southern District of New York
 500 Pearl St.
 New York, NY 10007
 Torres_NYSDChambers@nysd.uscourts.gov

Re: ***Lara S. Trafelet v. Cipolla & Co., LLC, No. 22-cv-4888 (AT) (VF)***

Dear Judge Torres:

We represent Petitioner Lara S. Trafelet. We write to respectfully request the Court's approval of the sealing of ten exhibits filed yesterday with Ms. Trafelet's opposition to Cross-Petitioner's motion to confirm, the redacted versions of which were attached to the Declaration of Erik S. Groothuis in Opposition (ECF No. 79) and the sealed versions of which were attached to the Declaration of Erik S. Groothuis in Opposition (ECF No. 80).

In accordance with the Court's prior orders on sealing (June 22, 2022 Order and ECF Nos. 55, 58, 61), Ms. Trafelet has redacted certain limited information that relates either to the terms of Ms. Trafelet's divorce settlement and maintenance award or to highly sensitive financial and/or personal information pertaining to Ms. Trafelet and her family, including her minor children. Ms. Trafelet has also sealed in its entirety a document that was provided by the counsel of her ex-husband, Remy Trafelet, pertaining to a divorce settlement proposal. Appendix A explains in more detail the redactions and/or sealing pertaining to each exhibit. As noted, these redactions protect the same type of information that this Court permitted to be sealed in your Honor's June 22 sealing order as well as your Honor's orders relating to the sealing of Respondent's exhibits (ECF Nos. 55, 58, 61).

In addition, Ms. Trafelet respectfully requests the Court's assistance with a related matter raised in Ms. Trafelet's November 23, 2022 letter (ECF No. 62). As explained in that letter, Ms. Trafelet identified a typographical error in Appendix A to her November 14 sealing request; she misidentified [REDACTED] as ECF No. 45-08 instead of [REDACTED], and therefore this Court's order restricting access to ECF No. 45-08 (ECF No. 55) did not, in fact, restrict access to [REDACTED] as intended. Ms. Trafelet respectfully requests that the Court restrict public access to [REDACTED] as well. (ECF No. 45-08 is separately required to be restricted pursuant to the Court's November 18, 2022 Order (ECF No. 58).)

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We appreciate the Court's continued assistance with these matters.

Respectfully submitted,

/s/ Jenna E. Ross

Jenna E. Ross

Jenner & Block LLP

Counsel for Petitioner Lara S. Trafellet

cc: Counsel for Respondent (via ECF and email)

GRANTED. ECF Nos. 80-1 through 80-10 shall remain under seal.

The Clerk of Court is directed to change the viewing level of ECF No. 45-80 to allow only the parties to access that document.

SO ORDERED.

Dated: December 14, 2022
New York, New York


ANALISA TORRES

United States District Judge